



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION III
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Office of Superfund
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Date: September 15, 1995

Ms. Brenda Norton, PE
 Atlantic Division, Naval Facilities Engineering Command
 Environmental Quality Division
 Code: 1822
 Building N 26, Room 54
 1510 Gilbert Street
 Norfolk, Va 23511-2699

Re: Naval Weapons Station, Yorktown, Va.
 Site 16/SSA 16
 Review of draft final *Record of Decision*

Dear Ms. Norton:

The U.S. Environmental Protection Agency (EPA) has reviewed the Navy's draft final *Record of Decision* for Site 16 and Site-Screening Area (SSA) 16, located at the Naval Weapons Station-Yorktown (WPNSTA) NPL facility, and we offer the following comments as outlined below. Please note that EPA legal comments have not been received in final form by the EPA remedial project manager as of the date of this letter. However, any additional significant EPA legal comments that are received by the EPA remedial project manager will be forwarded to the Navy as soon as they are received.

GENERAL COMMENT

1. Please include a discussion of why ARARs are not applicable to this ROD. Such a discussion could focus on the exceedance of MCLs in groundwater, with the conclusion that significant risk reduction would not occur at this particular site if the MCL exceedances were remediated since the naturally-occurring background concentrations of the inorganics detected in groundwater also exceed the MCL concentrations.

SPECIFIC COMMENTS

1. Page v, Declaration, Description of the Selected Remedy, 2nd paragraph

The second paragraph describes the use of the proscribed institutional controls well, but the paragraph does not discuss why these controls are needed. Please include a brief narrative describing the unacceptable systemic toxic exposure level(s) present at Site 16/SSA 16, under the child residential scenario, for both surface soil and ground water. It is this risk scenario that is driving the requirement for institutional controls.

2. Page v, Declaration, Declaration Statement

The last sentence of the Declaration Statement paragraph should be modified as outlined:

"A five year review will not be required for OU II under the selected alternative, since identified site

contaminants of concern, which are present at the site above health-based levels, have been determined to be within the concentration range of naturally-occurring background concentrations of inorganics found at the Naval Weapons Station."

3. Page v, Declaration, Signature designation for EPA

Please note the designated EPA official for signing the Record of Decision is:

Thomas C. Voltaggio, Director
Hazardous Waste Management Division
U.S. EPA - Region III

This concludes EPA's comments on the Navy's draft final *Record of Decision* for Site 16 and Site-Screening Area (SSA) 16, located at the WPNSTA NPL facility, exclusive of EPA legal comments. If you have any questions regarding the above, please feel free to call me at (215) 597-1110,

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Thomson".

Robert Thomson, PE
VA/WV Superfund Federal Facilities (3HW71)

cc: Steve Mihalko (VDEQ, Richmond)
Jeff Harlow (WPNSTA, 09E)
Clay Monroe (USEPA, 3RC31)